

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

CHAD UDEEN, MARY JANE  
JEFFERY, LYDIA RUNKEL,  
MICHAEL BOLICK, GARY GILPIN,  
ALICIA SMITH, and SUSAN  
WILLIAMS, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

SUBARU OF AMERICA, INC., and  
SUBARU CORPORATION,

Defendants.

No. 1:18-cv-17334-RBK-JS

**JURY TRIAL DEMANDED**

**CLASS ACTION**

**PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF  
CLASS ACTION SETTLEMENT AND REQUEST FOR PAYMENT OF  
ATTORNEYS' FEES, LITIGATION EXPENSES,  
AND INCENTIVE AWARDS**

**PLEASE TAKE NOTICE** that at the Final Fairness Hearing scheduled for 9:30 a.m. on March 4, 2020, Plaintiffs will move to have the Court grant their unopposed motion seeking entry of an order granting final approval of the Settlement and approving Plaintiffs' request for payment of attorneys' fees, litigation expenses, and incentive awards. Plaintiffs will rely on the Memorandum of Law and other related materials in support of this unopposed motion.

Dated: January 31, 2020

Respectfully submitted,

**CHIMICLES SCHWARTZ KRINER  
& DONALDSON-SMITH LLP**

/s/ Benjamin F. Johns

Benjamin F. Johns  
Andrew W. Ferich  
Alex M. Kashurba  
One Haverford Centre  
361 West Lancaster Avenue  
Haverford, PA 19041  
Telephone: (610) 642-8500  
Fax: (610) 649-3633  
*bfj@chimicles.com*  
*awf@chimicles.com*  
*amk@chimicles.com*

Daniel R. Lapinski  
**MOTLEY RICE LLC**  
210 Lake Drive East  
Suite 101  
Cherry Hill, NJ 08002  
Telephone: (856) 667-0500  
Fax: (856) 667-5133  
*dlapinski@motleyrice.com*

Kevin P. Roddy  
**WILENTZ, GOLDMAN  
& SPITZER, P.A.**  
90 Woodbridge Center Drive  
Suite 900  
Woodbridge, NJ 07095-0958  
Tel: 732-636-8000  
*kroddy@wilentz.com*

*Co-Lead Counsel for  
Plaintiffs and the Putative Class*

J. Llewellyn Mathews  
East Gate Center  
309 Fellowship Road  
Suite 200  
Mt. Laurel, NJ 08054  
Tel: (609) 519-7744  
*jlmathews@jlmesq.com*

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was filed with the Clerk using the Court's ECF system and therefore served electronically on all registered counsel of record on January 31, 2020.

/s/ Benjamin F. Johns

Benjamin F. Johns